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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
 Plaintiff,
 v.
 IL UNG KIM, et al.,
 Defendants.

No. CR 06-0692 PJH

STIPULATION AND [PROPOSED]
 ORDER IN RESPONSE TO DEFENDANT
 IL UNG KIM'S MOTION FOR BILL OF
 PARTICULARS

The parties stipulate as follows:

On February 7, 2007, Il Ung Kim ("defendant") and his counsel, Christopher M. Curran, Eric Grannon and Lawrence Callaghan, and the United States Department of Justice, represented by Niall E. Lynch and E. Kate Patchen, appeared before the Honorable Judge Phyllis J. Hamilton on a motion for bill of particulars filed by the defendant. The Court continued the motion to allow the parties an opportunity to meet and confer regarding a possible negotiated resolution of the motion. After meeting and conferring, the defendant and the government have agreed to the following terms and conditions:

1. The government will, by March 14, 2007, provide defendant with a description for the boxes of documents that do not currently contain a description on the log provided to the defendant by the government on December 13, 2006.

2. The government will provide defendant with a witness list and exhibit list at least 60 days prior to trial. This will not include summaries pursuant to Federal Rule of Evidence 1006, which will be provided on the date required in the Court's pretrial order.
3. Upon request, the government will provide technical assistance and use reasonable efforts to help the defendant load, OCR, and search the electronic discovery produced by the government.
4. The government hereby files with this stipulated Order a redacted summary of the government's theory of the case and essential facts as to defendant. The summary describes defendant's knowledge of and participation in the conspiracy charged in the Indictment. In addition, the summary addresses the means and methods specifically employed by defendant to further the goals of the conspiracy, and includes the names of some of the most significant witnesses.
5. The parties stipulate that ten (10) days before trial the summary shall constitute a bill of particulars in the above-captioned matter pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure. The government may amend the bill of particulars subject to such conditions as justice requires.

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1 DATED: February 27, 2007

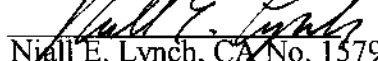
Respectfully submitted,

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3 I.U. KIM

U.S. DEPARTMENT OF JUSTICE

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5 BY: _____
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16 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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18 Dated: _____
19 United States District Court Judge
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1 DATED: February 27 2007

Respectfully submitted,

3 I.U. KIM

U.S. DEPARTMENT OF JUSTICE

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16 PURSUANT TO STIPULATION, IT IS SO ORDERED:

18 Dated: 3/1/07

United States

